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The Honorable Richard M. Berman
 United States District Judge
 Southern District of New York
 United States Courthouse
 40 Centre Street, Room 201
 New York, NY 10007-1581

USDC SDNY

DOCUMENT ELECTRONICALLY FILED

DOC #:

DATE FILED: 2/4/08

Dear Judge Berman

Re: Med-Asia Shipping Ltd. v. Cosco
 Beijing International Freight Co., Ltd.
 07 CV 9624 (RMB)
 Our Ref.: 128684-00601

SO ORDERED:

Date: 2/4/08

Richard M. Berman
 Richard M. Berman, U.S.D.J.

February 4, 2008

MEMO ENDORSED

We represent defendant Cosco Beijing International Freight Co. Ltd. in the referenced matter.

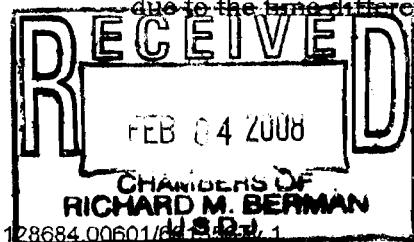
At the pre-motion conference on January 30, I suggested and opposing counsel and the Court agreed that our motion for countersecurity would be filed today, February 4, Plaintiff's opposition papers on February 11, and our reply papers on February 15.

We request an extension of the deadlines to February 7, 14, and 19, respectively. There are two reasons.

I am working with a colleague in Hong Kong who is the contact with the client in Beijing. Last Thursday evening her father suffered a heart attack and passed away Friday. I did not receive some of the information I expected for the motion.

Also, Hong Kong and China will celebrate their New Year February 7, 8, and 9, and it is likely that Plaintiff's counsel would have needed additional time in any event.

Opposing counsel does not object and has recommended that his client agree. However, due to the time difference, he will not hear from his client until tomorrow morning.



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Plaintiff is not prejudiced by this request, and, in the circumstances, I respectfully request that this request for an extension be granted.

Thank you and the Court in advance for your attention to this request.

Very truly yours,

A handwritten signature in black ink, appearing to read "LeRoy Lambert".

LeRoy Lambert

LRL:cn

cc: By Image
Kevin J. Lennon
Attorney for Plaintiff